

# Exhibit 7

GWACS Armory, LLC vs KE Arms, LLC  
Jovan Beltran

May 31, 2022

20-CV-0341-CVE-SH

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IN THE UNITED STATES COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

GWACS ARMORY, LLC, an Oklahoma  
limited liability company,

Plaintiff,

v.

KE ARMS, LLC, RUSSEL PHAGAN,  
SINISTRAL SHOOTING TECHNOLOGIES,  
LLC, BROWNELLS, INC. And SHAWN  
NEALON,

Defendants,

and

KE ARMS, LLC,

Plaintiff,

v.

GWACS ARMORY, LLC, GWACS DEFENSE  
INCORPORATED, JUD GUDGEL, RUSSEL  
ANDERSON, DOES I through X, and  
ROE CORPORATIONS I through X,

Defendants.

Case No.  
20-CV-0341-CVE-SH

Consolidated with  
Case No.  
21-CV-0107-CVE-SH

DEPOSITION OF JOVAN BELTRAN

PHOENIX, ARIZONA  
May 31, 2022

Prepared by:  
Deborah L. Tucker, RPR  
Certified Reporter  
Certification No. 50464

**CERTIFIED  
TRANSCRIPT**

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09:18:33 1 Q. Would there have been anybody other than  
09:18:36 2 Mr. Phagan or Mr. Kenney that had a discussion with you  
09:18:38 3 about the length they wanted for the buttstock?

09:18:40 4 A. No.

09:18:40 5 Q. And when was -- When were you doing this initial  
09:18:45 6 work on the KP-15 design?

09:18:48 7 A. Must have been sometime in, I think it was 2019.

09:18:56 8 Q. Do you recall what either Mr. Phagan or  
09:19:01 9 Mr. Kenney told you about the length that they wanted for  
09:19:03 10 the buttstock?

09:19:04 11 A. I don't recall.

09:19:06 12 Q. And you don't recall what model was provided for  
09:19:11 13 the buttstock that you used?

09:19:13 14 A. I don't remember the length on it.

09:19:14 15 Q. Do you remember what it looked like?

09:19:17 16 A. It looks very similar to the one that's on the  
09:19:24 17 KP. There was something about there's an M-Lok slot and  
09:19:28 18 they wanted to have it in a different position. They  
09:19:31 19 wanted a hole on here. There's changes that they had  
09:19:37 20 requested.

09:19:38 21 Q. From the model that you were looking at, they  
09:19:40 22 wanted to make modifications to make it their own?

09:19:43 23 A. So, it's like a buttstock kind of saying, like,  
09:19:46 24 "Oh, this is what we want, but we want to add this here  
09:19:49 25 and this here."

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09:19:52 1 Q. And do you remember that buttstock that you  
09:19:54 2 looked at? It had a sling slot, do you remember that?

09:19:58 3 MR. CALAWAY: Object to the form.

09:19:59 4 THE WITNESS: No, I think they just  
09:20:00 5 wanted -- and they call it an M-Lok slot. And there's  
09:20:04 6 sizes for that. If you want to attach an M-Lok, you just  
09:20:09 7 need to get the size of it and then they kind of pointed  
09:20:12 8 to where they wanted it.

09:20:13 9 BY MR. BOGAN:

09:20:14 10 Q. Explain to the jury what an M-Lok slot is.

09:20:18 11 A. M-Lok is a different company that makes  
09:20:21 12 attachments. They have their own way of -- I think it's a  
09:20:26 13 screw that rotates and locks it in place. And there's a  
09:20:30 14 size that a rectangle has to be machined to where then you  
09:20:36 15 could drop in and put it in there.

09:20:38 16 Q. I assume, since you did the design work, you're  
09:20:42 17 familiar that there's slot at the back of the buttstock  
09:20:45 18 for a sling --

09:20:46 19 MR. CALAWAY: Object to the form.

09:20:47 20 BY MR. BOGAN:

09:20:47 21 Q. -- on a KP-15?

09:20:49 22 MR. CALAWAY: Object to the form.

09:20:51 23 THE WITNESS: I don't know if it's for a  
09:20:53 24 sling. I know that it was requested for an M-Lok.

09:20:57 25 BY MR. BOGAN:

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09:20:57 1 Q. So that slot on the back was requested for an  
09:21:01 2 M-Lok; is that what you're saying?

09:21:02 3 A. Yes. And did the model that you looked at, did  
09:21:05 4 that have a slot like that?

09:21:07 5 MR. CALAWAY: Object to the form.

09:21:08 6 THE WITNESS: What model?

09:21:09 7 BY MR. BOGAN:

09:21:09 8 Q. You said that you looked at -- that you looked at  
09:21:12 9 a model. A model was provided of a buttstock, right?

09:21:17 10 A. I drew it. It's a model that -- I don't think we  
09:21:23 11 had a model for the buttstock. I think it was a physical  
09:21:26 12 one that I measured and I then got the basic rough  
09:21:29 13 features of it.

09:21:30 14 Q. Okay. So, the physical one that you measured,  
09:21:33 15 what did it look like?

09:21:34 16 A. It's very similar to the one that's on the KP-15  
09:21:39 17 but I don't think it had the slot on there at all or the  
09:21:42 18 other feature they wanted, like a little hole.

09:21:46 19 Q. So they wanted to add a hole for -- use a QD  
09:21:49 20 swivel hole? Do you remember that?

09:21:50 21 A. I believe so, yes.

09:21:51 22 Q. They wanted to add that and they wanted to add a  
09:21:53 23 slot.

09:21:53 24 A. Yeah. So they showed me -- it's a blank one. I  
09:21:55 25 can't recall if it had anything. It's just "We want this

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09:25:36 1 and what is required to make a part in a mold.

09:25:41 2 Q. Did you do the design work to add the ribbing  
09:25:51 3 inside of the buttstock?

09:25:52 4 MR. CALAWAY: Object to the form.

09:25:54 5 THE WITNESS: I knew that there had to be a  
09:25:58 6 certain thickness. And same thing to -- My understanding  
09:26:05 7 was there's a certain amount of web thickness that needed  
09:26:08 8 to happen in order for the part not to bow, or whatever  
09:26:14 9 needed to mold.

09:26:15 10 BY MR. BOGAN:

09:26:16 11 Q. And Mr. Phagan told you about that, correct?

09:26:18 12 MR. CALAWAY: Object to the form.

09:26:19 13 THE WITNESS: About what?

09:26:19 14 BY MR. BOGAN:

09:26:20 15 Q. The thickness that needed to be added.

09:26:22 16 A. No. I spoke to the mold expert.

09:26:26 17 Q. So you spoke with Mr. Sperry about the  
09:26:30 18 thicknesses before you sent him the file?

09:26:33 19 A. Yes.

09:26:34 20 Q. Did Mr. Sperry tell you how to lay out the rib  
09:26:39 21 design inside of the buttstock?

09:26:41 22 A. I don't believe he did.

09:26:45 23 Q. Do you know where you came up with the rib design  
09:26:48 24 for the buttstock?

09:26:49 25 A. I think --

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09:26:50 1 MR. CALAWAY: Object to the form.

09:26:52 2 THE WITNESS: I think I saw it.

09:26:54 3 BY MR. BOGAN:

09:26:54 4 Q. Where did you see it?

09:26:56 5 A. I did see it in the model that was provided.

09:27:01 6 Q. The CAV-15 model?

09:27:04 7 MR. CALAWAY: Object to the form.

09:27:05 8 THE WITNESS: I think so.

09:27:06 9 BY MR. BOGAN:

09:27:07 10 Q. So you saw the ribbing design in the CAV-15 model

09:27:11 11 that was a CAD file?

09:27:12 12 A. Yes.

09:27:13 13 Q. And you used that model, right?

09:27:15 14 MR. CALAWAY: Object to the form.

09:27:16 15 THE WITNESS: No. I couldn't use that

09:27:17 16 model.

09:27:18 17 BY MR. BOGAN:

09:27:18 18 Q. You used that model to do the spacing of the

09:27:20 19 ribbing, though, right?

09:27:21 20 MR. CALAWAY: Object to the form.

09:27:22 21 THE WITNESS: I don't think I took any

09:27:24 22 dimensions or anything from that model.

09:27:26 23 BY MR. BOGAN:

09:27:27 24 Q. Can you tell this jury how the spacing of the

09:27:30 25 ribbing in that buttstock of the KP-15 matches the ribbing

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09:27:34 1 of the CAV-15 then?

09:27:35 2 MR. CALAWAY: Object to the form.

09:27:36 3 THE WITNESS: I cannot tell you that. I can  
09:27:38 4 tell you that there's certain distances, like inside that  
09:27:44 5 buffer tube, that have to be -- There's a spring and a  
09:27:50 6 buffer and all these components that make the firearm work  
09:27:53 7 and those are not to be changed, under my understanding.

09:27:57 8 BY MR. BOGAN:

09:27:58 9 Q. And who gave you that understanding?

09:28:00 10 A. From -- I know that Russell will tell me, you  
09:28:06 11 know, in order for the firearm to cycle correctly there --  
09:28:09 12 the distance from the back of the buffer to the face of  
09:28:14 13 the lower receiver has to be a certain distance. And then  
09:28:20 14 he -- it's, like, the webbing, the spacing in between, is  
09:28:23 15 just distance -- equal space distance.

09:28:30 16 Q. So, the ribbing that goes into the buttstock of  
09:28:33 17 the KP-15 is just going to be equally spaced?

09:28:37 18 A. There was -- yes. There was a talk about that,  
09:28:41 19 about where the webbing would be. And it's just, like,  
09:28:45 20 okay, we'll do the webbing there and just equally space it  
09:28:50 21 and put it in between.

09:28:51 22 Q. And I apologize if you've already said this, but  
09:29:03 23 you are the one who did the fusing of the buttstock, the  
09:29:06 24 handle, the magwell, you did all that work, correct?

09:29:09 25 A. Yes.



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09:29:10 1 Q. And you did all that in Mastercam, right?

09:29:13 2 A. Yes.

09:29:19 3 Q. And was it Mr. Phagan that gave you -- yeah.

09:29:23 4 Never mind. You already answered that. Strike that.

09:29:25 5 MR. CALAWAY: We've been going for about an  
09:29:27 6 hour. Can we take a quick break?

09:29:29 7 MR. BOGAN: Yeah. Can we keep it quick,  
09:29:29 8 though, because we're trying to cram all these in in two  
09:29:29 9 days?

09:29:33 10 MR. CALAWAY: I've just got to use the  
09:29:35 11 restroom. I don't know, five minutes?

09:29:37 12 MR. BOGAN: Yeah. We can take a quick  
09:29:39 13 break. We can go off the record.

09:29:39 14 (Recess taken from 9:29 a.m. to 9:36 a.m.)

09:36:37 15 MR. BOGAN: Okay. We're back on the record  
09:36:46 16 after a short break.

09:36:46 17 BY MR. BOGAN:

09:36:47 18 Q. It's your understanding that you're still under  
09:36:49 19 oath, correct?

09:36:50 20 A. Yes.

09:36:50 21 Q. And when we left off, we were walking through,  
09:36:52 22 kind of, the steps that you were performing to create this  
09:36:56 23 model of the KP-15. And we were specifically talking  
09:37:00 24 about the ribbing inside of the buttstock, I believe, when  
09:37:03 25 we left off. Do you recall that?

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09:57:16 1 Q. And at the very bottom bullet, it says "Wide  
09:57:22 2 Flange New Process 2021." Do you see that?

09:57:25 3 A. Yes.

09:57:26 4 Q. What is that?

09:57:26 5 A. Billet AR-15 wide flange, that's -- that's the  
09:57:36 6 model of the KE Arms wide flange. That new process is a  
09:57:43 7 new folder, and I think that's just where it's saved.

09:57:48 8 Q. Do you know what was new about that process in  
09:57:51 9 2021?

09:57:52 10 A. Yes.

09:57:54 11 Q. What's that?

09:57:55 12 A. That goes back to machining the aluminum  
09:58:00 13 receiver. There's a change in fixturing and machining.

09:58:04 14 Q. Did you -- When you were designing or modeling  
09:58:51 15 the ribbing in the buttstock, did you lay out a sketch or  
09:58:55 16 wireframe geometry to design those internal ribbing  
09:59:00 17 components?

09:59:01 18 A. I can't recall how it came about. I don't know  
09:59:04 19 if it was something along the lines of "This is kind of  
09:59:08 20 what we want," like, pointed out to me. I -- I don't  
09:59:14 21 recall the exact way it was told to me, how it was to be  
09:59:22 22 laid out.

09:59:23 23 Q. Well, you saw the ribbing in the CAV-15 model  
09:59:28 24 that you looked at. You said you didn't measure it, I  
09:59:31 25 think. But you saw the ribbing in there, correct?

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11:24:24 1 Q. Go to Page 2.

11:24:32 2 A. Yeah, okay. Yeah, I see it.

11:24:37 3 Q. Do you know why Russell's adding you back to this

11:24:40 4 chain?

11:24:40 5 A. Well, I'll have to read all this and find out.

11:24:50 6 That e-mail says, "Is it possible for us to

11:24:52 7 get samples?" So, he attached me to that.

11:25:01 8 Q. All right. Let's go to page -- or Exhibit 192,

11:25:09 9 please. You there?

11:25:19 10 A. Yes.

11:25:27 11 Q. This -- It looks like it's got numbered lines.

11:25:30 12 Do you see that on the left side there?

11:25:32 13 A. Yes.

11:25:32 14 Q. Starts with 19?

11:25:33 15 A. Yes.

11:25:35 16 Q. It says, "Mastercam, forward slash, parts." Do

11:25:39 17 you see that?

11:25:39 18 A. Yes.

11:25:40 19 Q. Blum, B-l-u-m, do you see that?

11:25:41 20 A. Yes.

11:25:42 21 Q. And then do you know what R-o-h-t-e-i-l is?

11:25:48 22 A. I don't.

11:25:49 23 BY MR. BOGAN:

11:25:50 24 Q. And then dot, S-T-L, I was told that was stereo

11:25:54 25 lithography.

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11:25:55 1 A. STL, yes.

11:25:57 2 Q. And then do you see where it CAV-15?

11:25:57 3 A. Yes.

11:26:02 4 Q. See where it says KE Arms?

11:26:03 5 A. Yes.

11:26:03 6 Q. Do you see where it says Jovan?

11:26:05 7 A. Yes.

11:26:06 8 Q. And you see REV?

11:26:10 9 A. Yes.

11:26:11 10 Q. Why is that there?

11:26:12 11 MR. CALAWAY: Object to the form.

11:26:12 12 THE WITNESS: I don't know.

11:26:12 13 BY MR. BOGAN:

11:26:13 14 Q. Do you know that this is in the file code for the

11:26:19 15 KP-15?

11:26:20 16 MR. CALAWAY: Object to the form.

11:26:21 17 THE WITNESS: Okay.

11:26:21 18 BY MR. BOGAN:

11:26:22 19 Q. Is there any reason --

11:26:23 20 A. I don't know.

11:26:23 21 Q. Is there any reason that your name and CAV-15

11:26:27 22 would appear in a file name for a KP-15?

11:26:30 23 A. I don't know.

11:26:32 24 Q. You have no explanation for how your name is

11:26:36 25 associated with CAV-15 in a KP-15 file?

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11:26:40 1 A. I don't know.

11:26:41 2 Q. It's because you downloaded it, didn't you?

11:26:44 3 MR. CALAWAY: Object to the form.

11:26:44 4 MR. BOGAN: You can laugh all you want,  
11:26:46 5 Counsel.

11:26:46 6 THE WITNESS: I downloaded what?

11:26:47 7 BY MR. BOGAN:

11:26:47 8 Q. You downloaded the CAV-15 into this file, didn't  
11:26:50 9 you?

11:26:50 10 A. I don't know what file this is.

11:26:51 11 Q. You understand, sir, that you're under oath right  
11:26:54 12 now, right?

11:26:54 13 A. Yes.

11:26:55 14 Q. Did you download the CAV-15 file into any file?

11:26:59 15 A. I don't believe so.

11:27:00 16 Q. Why -- Do you have any explanation for why your  
11:27:03 17 name, Jovan, is associated with not only Mastercam,  
11:27:10 18 KE Arms, but also the CAV-15 in a file list?

11:27:15 19 A. I don't recall about when Russell -- we opened  
11:27:20 20 the file. I don't know if, even though it was corrupted  
11:27:25 21 we saved the file or if we just closed it and -- I don't  
11:27:31 22 know if we had it at one point "saved as," it might have  
11:27:35 23 been that, KE Arms and my name, just to save it when we  
11:27:39 24 initially looked at it from that USB drive.

11:27:44 25 Q. Have you ever used the abbreviation "REV" before?

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11:27:52 1 A. Yes.

11:27:52 2 Q. What do you use that for?

11:27:54 3 A. Revisions.

11:27:55 4 Q. Okay. So why would CAV-15, KE Arms, Jovan and  
11:28:02 5 revisions be saved by you opening that file in Mastercam?

11:28:06 6 MR. CALAWAY: Object to the form, asked and  
11:28:09 7 answered.

11:28:09 8 Go ahead.

11:28:10 9 THE WITNESS: I don't know the reasoning  
11:28:12 10 behind it. This whole extension doesn't seem familiar,  
11:28:17 11 but KE Arms, all capital letters -- capital letters is  
11:28:22 12 usually how I name my files. So . . .

11:28:26 13 BY MR. BOGAN:

11:28:26 14 Q. Right. So you didn't name CAV-15, right? That  
11:28:30 15 was already named?

11:28:31 16 A. Yeah, it looks like it. I don't know what the  
11:28:35 17 other extensions are, the BLUM and the BLOTHIO (sic).

11:28:40 18 Q. Do you know what MK3 lower impression pockets1  
11:28:45 19 means?

11:28:45 20 MR. CALAWAY: Object to the form. Where are  
11:28:47 21 we reading now?

11:28:48 22 MR. BOGAN: On the page that I'm looking at.

11:28:48 23 BY MR. BOGAN:

11:28:50 24 Q. Do you know what MK3 lower impression pockets1  
11:28:54 25 means?

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11:28:54 1 MR. CALAWAY: Object to form. I don't see  
11:28:55 2 this on this page.

11:28:56 3 MR. BOGAN: I don't care if you see it or  
11:28:58 4 not. I'm asking him if he knows what it means.

11:29:00 5 THE WITNESS: So, MK3, at one point I  
11:29:03 6 remember Russell mentioning that. And at one point I was  
11:29:07 7 calling it MK3.

11:29:08 8 The impressions would be the pockets that I  
11:29:10 9 used to make extrusions from the model I created.

11:29:14 10 BY MR. BOGAN:

11:29:14 11 Q. Those pockets for the ribbing, right? Those were  
11:29:18 12 the impressions you talked about earlier, right?

11:29:20 13 A. Correct.

11:29:22 14 Q. So you know what that means, right, in this  
11:29:25 15 document? That's the familiar to you, right?

11:29:27 16 A. What means?

11:29:27 17 Q. MK3 lower impression pockets, that's familiar to  
11:29:32 18 you, right?

11:29:33 19 A. It is.

11:29:34 20 Q. What about MK3 lower nuts?

11:29:39 21 A. Where is that?

11:29:40 22 Q. Right above the impression pockets.

11:29:44 23 A. Oh, lower nuts?

11:29:48 24 Q. Um-hum, yes.

11:29:49 25 A. I can think of something that would mean. I'm

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11:29:56 1 not exactly sure.

11:29:57 2 Q. Okay. Let's keep going. KP-15 stock cover

11:30:02 3 plate1?

11:30:02 4 A. That sounds familiar.

11:30:04 5 Q. And stock blend fixed1. Sound familiar?

11:30:10 6 A. Yes.

11:30:11 7 Q. One and side 21, do you know what that means?

11:30:17 8 A. I think it's a Side 1 and Side 2. The other one

11:30:21 9 says stock blend fixed, and then there's a number one. So

11:30:25 10 they all kind of end with a number one at the end.

11:30:28 11 Q. Okay. Yeah, that's a good observation.

11:30:30 12 A. Yeah.

11:30:31 13 Q. Lower and stock merge1 sounds familiar to you,

11:30:33 14 right?

11:30:33 15 A. Yes.

11:30:34 16 Q. Billet and grip merge, remove buffer threads1

11:30:38 17 sounds familiar to you, right?

11:30:39 18 A. Yes.

11:30:40 19 Q. Profile1 -- I'm sorry, stock profile1 sounds

11:30:43 20 familiar to you, right?

11:30:44 21 A. Yes.

11:30:45 22 Q. Merge billet and grip1 sounds familiar to you,

11:30:48 23 right?

11:30:49 24 A. Yes.

11:30:51 25 Q. So, all of those other things on this page sound



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11:30:54 1 familiar to you, correct?

11:30:55 2 A. Correct.

11:30:55 3 Q. And they are also talking about the stock, right?

11:31:02 4 A. Umm, not necessarily.

11:31:07 5 MR. CALAWAY: I'm going to object to the

11:31:08 6 form of the question.

11:31:08 7 BY MR. BOGAN:

11:31:10 8 Q. Stock cover, correct? Line 126, stock cover

11:31:15 9 plate.

11:31:15 10 A. Okay.

11:31:16 11 Q. Stock blend fixed?

11:31:20 12 A. Yes.

11:31:21 13 Q. Lower and stock merge, right?

11:31:26 14 A. Yes.

11:31:26 15 Q. All dealing with the buttstock, correct?

11:31:30 16 A. Some.

11:31:33 17 Q. All of those stock references are dealing with

11:31:36 18 the buttstock, correct?

11:31:37 19 A. The ones you mentioned. There's another one --

11:31:40 20 There's lower nuts, and then there's the impression for

11:31:43 21 the pockets. I wouldn't say this just talks about the

11:31:46 22 stock.

11:31:46 23 Q. It talks about the stock?

11:31:48 24 A. As well as other component.

11:31:50 25 Q. Right. Impressions in the pockets, that's in the

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1 STATE OF ARIZONA )

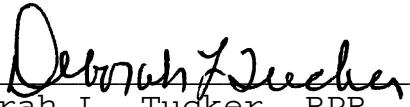
2 COUNTY OF MARICOPA )

3 BE IT KNOWN the foregoing deposition was  
4 taken by me pursuant to stipulation of counsel; that I was  
5 then and there a Certified Reporter of the State of  
6 Arizona, and by virtue thereof authorized to administer an  
7 oath; that the witness before testifying was duly sworn by  
8 me to testify to the whole truth; notice was provided that  
9 the transcript was available for signature by the  
10 deponent; that the questions propounded by counsel and the  
11 answers of the witness thereto were taken down by me in  
12 shorthand and thereafter transcribed into typewriting  
13 under my direction; that the foregoing pages are a full,  
14 true, and accurate transcript of all proceedings and  
15 testimony had and adduced upon the taking of said  
16 deposition, all to the best of my skill and ability.

17 I FURTHER CERTIFY that I am in no way related to  
18 nor employed by any parties hereto nor am I in any way  
19 interested in the outcome hereof.

20 DATED at Phoenix, Arizona, this 20th day of  
21 June, 2022.

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Deborah L. Tucker, RPR  
Certified Reporter #50464